

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE AT JACKSON**

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**UNITED STATES OF AMERICA**

**v.**

**Case # 1:19cr10042 STA**

**THOMAS KELLEY BALLARD, III**

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**MOTION TO AMEND PROTECTION ORDER**

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Comes now Leslie I. Ballin who files this Motion to amend the protection order entered in this cause and in support would show as follows:

That Counsel would move that he be allowed to provide the Defendant, Thomas Kelley Ballard, III with copies of the Defendant's office patient files for victims AL and LM for the Defendant to be allowed to review same to adequately prepare his defense;

Further, that should the Court allow Defendant to have a copy, Defendant shall be prohibited from disclosing any information to any third party.

That AUSA Jason Knutson does not object to this request.

WHEREFORE, PREMISES CONSIDERED, Counsel prays that the protection order be amended to allow him to provide a copy of Defendant's office patient files for victims AL and LM to the Defendant, Thomas Kelley Ballard, III, for the reasons set out herein above.

Further, that should this request be granted, Defendant be prohibited from sharing any information obtained from the discovery with any third party.

Respectfully Submitted,

/s/ Leslie I. Ballin, Esq.

BALLIN, BALLIN & FISHMAN, P.C.

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Attorney for Defendant

CERTIFICATE OF CONSULTATION

I, Leslie I. Ballin, hereby confirm that I have consulted with AUSA Jason Knutson and he has no objection to this request.

/s/ Leslie I. Ballin, Esq.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the Honorable S. Thomas Anderson, Jason Knutson, Assistant United States Attorneys and all other interested parties via e-mail, via United States mail, first class postage prepaid, or via hand delivery, this the 14th day of July, 2020.

/s/ Leslie I. Ballin, Esq.